

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

NEIL COLE,

Defendant.

No. 19-cr-00869 (ER)

**NOTICE OF MOTION *IN LIMINE* TO EXCLUDE CONSPIRACY
EVIDENCE AND ARGUMENT**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, defendant Neil Cole will move this Court, before the Honorable Edgardo Ramos, United States District Judge for the Southern District of New York, at the United States Courthouse, 40 Foley Square, New York, New York, on a date and time to be determined by the Court, for an order granting Mr. Cole's Motion *in Limine* to exclude conspiracy evidence and argument, and for such other relief as the Court may deem just and proper.

Dated: New York, New York
October 3, 2022

/s/ Sean Hecker

KAPLAN HECKER & FINK LLP

Sean Hecker
Jenna M. Dabbs
Rebecca Sussman
Jeffrey Then
350 Fifth Avenue, 63rd Floor
New York, New York 10118
Telephone: (212) 763-0883

MARKUS/MOSS PLLC

David Oscar Markus*
A. Margot Moss*
40 NW 3rd Street, PH 1
Miami, Florida 33128
Telephone: (305) 379-6667

Attorneys for Neil Cole

**Admitted pro hac vice*